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May 17, 2018

VIA EMAIL

Justice Roberto A. Rivera-Soto (ret.)
Special Discovery Master
Ballard Spahr LLP
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**Re: *Williams v. BASF Catalysts LLC*, No. 11-1754
Amendment of ECF 403 -Order re: ECF 383**

Dear Justice Rivera-Soto:

Plaintiffs and BASF are writing to Your Honor regarding (1) the Rule 30(b)(6) deposition of BASF's corporate representative and (2) Plaintiffs' responses to BASF's requests for admission.

By way of background, on April 9, 2018, Plaintiffs served a 30(b)(6) notice to BASF that included 60 topics. On April 19, 2018, BASF objected on the grounds that Plaintiffs' notice was overbroad, unduly burdensome, not proportional, and sought privileged information. On May 8, 2018, the parties met and conferred about Plaintiffs' notice. During that discussion, Plaintiffs explained that they would be serving an amended notice that, in Plaintiffs' view, would address BASF's concerns about the April 9, 2018 notice. On May 8, 2018, plaintiffs served an amended 30(b)(6) notice setting forth 14 topics, which was further reduced to 11 topics by a second amended notice on May 10th.

In subsequent meet and confer discussions, BASF stated that it could not reasonably prepare a witness on the topics contained in the May 10th notice because of the limited time left in fact discovery. Plaintiffs and BASF therefore agreed that the 30 (b)((6) examination could go forward after May 21, 2018, subject to the Court's approval, so that BASF would have adequate time to prepare the witness. Plaintiffs and BASF therefore respectfully request that leave be granted so that the deposition of BASF's 30(b)(6) designee can occur after May 21. Plaintiffs and BASF expect that the deposition would occur no later than June 6, 2018.

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Plaintiffs and BASF also discussed Plaintiffs' responses to BASF's requests for admission, which were served upon each of the Plaintiffs on April 20, 2018. Plaintiffs' responses currently are due on May 21, 2018. Because discovery remains ongoing, and to facilitate a review of those requests and the preparation of responses, Plaintiffs requested a two-week extension of time to respond. BASF agreed to that extension, subject to the Court's approval. Plaintiffs therefore request, with BASF's consent, that a two-week extension be granted so that Plaintiffs' responses are due on Monday, June 4, 2018.

Thank you for your kind consideration of this request.

Respectfully submitted,

/s/ Christopher M. Placitella

Christopher M. Placitella

*Counsel for Plaintiffs
and the Proposed Class*

cc: Defense Counsel of Record (*via email*)